

1 JOSEPH A. VELEZ
2 ATTORNEY AT LAW (SBN: 16059)
3 7272 E. Indian School Rd., Ste. 111
4 Scottsdale, Arizona 85251
5 480.710.5079
6 Attorney for Plaintiff
7 jvelezesq@me.com

8 **IN THE UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10 Dr. Irina Beloozerova,
11
12 Plaintiff,

13 v.

14 Dignity Health, a foreign nonprofit
15 corporation, d/b/a St. Joseph's Hospital and
16 Medical Center, and d/b/a Barrow
17 Neurological Institute; John Doe's I - V; Gray
18 Corporations I - V,

19 Defendants,
20
21
22

No. 2:18-cv-01976-DGC

PLAINTIFF'S RULE 41(a)(2)
MOTION TO VOLUNTARILY
DISMISS WITH PREJUDICE

(Assigned: Hon. David G. Campbell)

23 Pursuant to Federal Rule of Civil Procedure 41(a)(2), the Plaintiff Dr. Irina
24 Beloozerova moves the Court to dismiss all four (4) counts of her Complaint against
25 Defendant Dignity Health with prejudice¹. In support of this Motion, the Plaintiff states as
26 follows:
27

28 ¹ This would include all named parties in Plaintiff's Complaint.

3. Plaintiff seeks this dismissal *with prejudice*.

WHEREFORE, the Plaintiff respectfully moves this Court to dismiss with prejudice all four (4) claims asserted in her Complaint against Defendant.

DATED this 29th day of August, 2018.

/s/ Joseph A. Velez

JOSEPH A. VELEZ

7272 E. Indian School Rd., Ste. 111

Scottsdale, Arizona 85251

480.710.5079

Attorney for Plaintiff Dr. Irina Beloozerova

CERTIFICATE OF SERVICE

I, Joseph Velez, attorney for Plaintiff, hereby certifies that on 29th of August, 2018, I electronically transmitted the attached document to the following attorneys:

Stephanie Quincy, Esq.

Nicole Simmons, Esq.

Quarles & Brady, LLP.

Renaissance One, Two North Central Avenue

Phoenix, AZ 85004-2391

stephanie.Quincy@quarles.com

Nicole.Simmons@quarles.com

By: **/s/ Joseph A. Velez**